

Jim McDonnell, Sheriff

County of Los Angeles

Sheriff's Department Headquarters

4700 Ramona Boulevard
Monterey Park, California 91754-2169



June 3, 2015

Deputy Jae Seung, #[redacted]
[redacted]

Dear Deputy Smith:

On April 17, 2015, you were served with a Letter of Intention indicating your right to respond to the Sheriff's Department's pending disciplinary action against you, as reported under File Number IAB 2352595. You were also advised of your right to review the material on which the discipline was based.

You did not exercise your right to respond. The grievance period involved has now elapsed, with no change in discipline.

You are hereby notified that you are discharged from your position of Deputy Sheriff, Item No. 2708A, with this Department, effective as of the close of business on May 29, 2015.

An investigation under File Number IAB 2352595, conducted by Internal Affairs Bureau, coupled with your own statements, has established the following:

1. That in violation of Manual of Policy and Procedures Sections 3-01/050.10, Performance to Standards; and/or 3-01/030.05, General Behavior; and/or 3-01/050.05, Performance of Duty, on or between February 21, 2013 through March 01, 2013, while on-duty, you failed to establish and maintain the highest standard of efficiency in carrying out the functions and objectives of the Department, and/or conform to the standards established for your rank as a custody deputy, and/or devote your time and attention to the service of the County when you promoted gun sales in support of your employment with a private company ([redacted]) as evidenced by, but not limited to the following:

a. distributing advertisements regarding the private company you were employed with in the workplace; and/or,

b. placing order forms from Windham Weaponry in Department authorized employee mail receptacles as a means to promote the private company you were employed with; and/or

c. making personal contacts with on duty Department employees in an effort to promote the private company you were employed with and to facilitate the purchase of guns; and/or,

d. accessing Department computers and the Department's data network to send emails, conduct research and develop order forms in order to promote and facilitate gun sales in support of the private company you were employed with.

Your conduct brought discredit to yourself and/or the Department.

2. That in violation of Manual of Policy and Procedure Sections 3-01/000.13, Professional Conduct – Core Values; and/or 3-01/000.10, Professional Conduct; and/or 3-01/030.07, Immoral Conduct, on or about February 21, 2013 through March 01, 2013, you failed to maintain a level of moral conduct, trust, and integrity in your personal and business affairs which is in keeping with the highest standards of the law enforcement profession as evidenced by but limited to the following:

a. manipulating an order form from the Windham Weaponry company by placing a Sheriff Star and Logo for which the Department holds a patent (trademark) to on the form for the purposes of passing it as an official Department form without the Department's permission; and/or,

b. using personal information of various Department employees on various order forms to purchase weapons prior to receiving their permission and/or without their knowledge, and/or after being told they were not interested in ordering a weapon; and/or,

c. placing a mark, which purported to be valid signatures, on the signature line of various order forms that were sent to Windham Weaponry under the names of various employees without their permission and/or knowledge; and/or,

d. providing employees and using order forms with the Department's Star and Logo on it which circumvented the Department protocol for verifying employment as listed under

Manual of Policy and Procedure Section 3-03/210.20, Firearm Purchase and Authorization; and/or,

e. sending document(s), that represented gun sales order forms and were manipulated to include the Department's Star and Logo and purported to represent Department authorized employment verification to Windham Weaponry company.

3. That in violation of Manual of Policy and Procedures Sections 3-01/030.10, Obedience to Laws, Regulations, and Orders [as it pertains to 3-07/210.05, Permissible Use; and/or 3-07/220.00, Prohibitions]; and/or 3-01/100.45, Use of Communications Equipment; and/or 3-01/040.62, Use of Sheriff's Intellectual Property Stars/Logos, on or about August 20, 2014, you admitted in your administrative interview that on or between February 21, 2013 and March 01, 2013, while on duty you accessed the Department's Data Network and used Department computers to manipulate a Windham Weaponry order form to include the Department's Star and Logo on it. You admitted you used the Department's Data Network and Department computers for personal gain, and unofficial purposes which did not support the law enforcement mission of the Department when you sent and received e-mail messages and conducted research to promote the private company ([redacted], your secondary employer. You failed to receive permission to use the Department's Star and Logo, and/or used the Star and Logo in an unofficial capacity.

4. That in violation of Manual of Policy and Procedures Sections 3-01/040.85, Cooperation during a Criminal Investigation; and/or 3-01/040.70, False Statements, on or about February 7, 2013, you failed to make full, complete and/or truthful statements during an internal criminal investigations interview, as evidenced by but not limited to the following:

a. stating that you had permission to complete and send manufactured order forms to Windham Weaponry using several different deputies' information including [redacted], [redacted], [redacted] and [redacted] and/or words to that effect; and/or,

b. stating that you did not fill out the manufactured order forms sent to Windham Weaponry which contained several deputies' personal information, and/or words to that effect; and/or,

c. stating that you did not sign the manufactured order forms sent to Windham Weaponry using several different deputies' information, and/or words to that effect.

Additional facts for this decision are set forth in the Disposition Worksheet, Investigative Summary and Investigative Packet which are incorporated herein by reference.

In taking this disciplinary action, your record with this Department has been considered, and a thorough review of this incident has been made by Department executives, including your Unit and Division Commanders.

You may appeal the Department's action in this matter pursuant to Rules 4.02, 4.05 and 18.02 of the Civil Service Rules.

You may, if you so desire, within fifteen (15) business days from the date of service of this notice of discharge, request a hearing on these charges before the Los Angeles County Civil Service Commission, 222 North Grand Avenue, Los Angeles, California 90012.

The Sheriff's Department reserves the right to amend and/or add to this letter.

Sincerely,

JIM M. McDONNELL, SHERIFF

ERIC G. PARRA, CHIEF
CUSTODY SERVICES DIVISION-GENERAL POPULATION

Note: Attached for your convenience are excerpts of the applicable areas of the Manual of Policy and Procedures and Civil Service Rules.

EGP:EMS:DLM:vv

cc: Advocacy Unit
Eric G. Parra, Chief, Custody Services Division-General Population
Kevin E. Hebert, Captain, North County Correctional Facility
Internal Affairs Bureau
Judy A. Gerhardt, Captain, Personnel Administration

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COUNTY OF LOS ANGELES

SHERIFF'S DEPARTMENT

"A Tradition of Service"

DISPOSITION SHEET

DATE: March 24. 2015
File No: IV #

FROM: ERIC G. PARRA, CHIEF
CUSTODY SERVICES DIVISION
GENERAL POPULATION

TO: DONNIE L. MAULDIN, CAPTAIN
INTERNAL AFFAIRS BUREAU

SUBJECT: **JAE SEUNG #[redacted]**
DEPUTY SHERIFF
NORTH COUNTY CORRECTIONAL FACILITY

Upon consideration of the facts developed in this investigation, I have determined that **Subject Seung** be **DISCHARGED** from his position as a Deputy Sheriff for the reasons set forth in the attached documentation. This decision may be reconsidered based upon the employee's response.

Eric G. Parra, Chief — Date: 4/16/15

CASE REVIEWED BY PANEL MEMBERS

Richard J. Barrantes, Assistant Sheriff — Date: 4-9-15

Michael J. Rothans, Assistant Sheriff — Date: 3/24/15

Neal Tyler, Executive Officer — Date: 4/10/15

Jim McDonnell, Sheriff — Date: 4-14-15

Seung, Jae, #[redacted]
Deputy Sheriff
North County Correctional Facility
Custody Services Division – General Population

IV #2352595

The evidence in this investigation supports the following charges:

1. That in violation of the Manual of Policy and Procedures Sections 3-01/050.10, Performance to Standards; and/or 3-01/040.05, General Behavior; and/or 3-01/050.05, Performance of Duty, on or between February 21, 2013 through March 01, 2013, while on-duty, Subject Seung failed to establish and maintain the highest standard of efficiency in carrying out the functions and objectives of the Department, and/or conform to the standards established for his rank as a custody deputy, and/or devote his time and attention to the service of the County when he promoted gun sales in support of his employment with a private company ([redacted]) as evidenced by, but not limited to the following:

   a. distributing advertisements regarding the private company he was employed with in the workplace; and/or,

   b. placing order forms from Windham Weaponry in Department authorized employee mail receptacles as a means to promote the private company he was employed with; and/or

   c. making personal contacts with on-duty employees in an effort to promote the private company he was employed and to facilitate the purchase of guns; and/or,

   d. accessing Department computers and the Department's data network to send emails, conduct research and develop order forms in order to promote and facilitate gun sales in support of the private company he was employed with.

Subject Seung's conduct brought discredit to himself and/or the Department.

2. That in violation of Manual of Policy and Procedure Sections 3-01/000.13, Professional Conduct – Core Values; and/or 3-01/000.10, Professional Conduct; and/or 3-01/030.07, Immoral Conduct, on or about February 21, 2013 through March 01, 2013, Subject Seung failed to maintain a level of moral conduct, trust, and integrity in his personal and business affairs which is in keeping with the highest standards of the law enforcement profession as evidenced by but limited to the following:

   a. manipulating an order form from the Windham Weaponry company by placing a Sheriff Star and Logo which the Department hold a patent (trademark) to on the form for the purposes of passing it as an official Department form without the Department's permission; and/or,

b. using personal information of various Department employees on various order forms to purchase weapons prior to receiving their permission and/or without their knowledge, and/or after being told they were not interested in ordering a weapon; and/or,

c. placing a mark, which purported to be valid signatures, on the signature line of various order forms that were sent to Windham Weaponry under the name of various employees without their permission and/or knowledge; and/or,

d. providing employees and using order forms with the Department's Star and Logo on it which circumvented the Department protocol for verifying employment as listed under Manual of Policy and Procedure Section 3-03/210.20, Firearm Purchase and Authorization; and/or,

e. sending document(s), that represented gun sales order forms and were manipulated to include the Department's Star and Logo and purported to represent Department authorized employment verification to Windham Weaponry company.

3. That in violation of the Manual of Policy and Procedures Sections 3-01/030.10, Obedience to Laws, Regulations, and Orders [as it pertains to 3-07/210.05, Permissible Use; and/or 3-07/220.00, Prohibitions]; and/or 3-01/100.45, Use of Communications Equipment; and/or 3-01/040.62, Use of Sheriff's Intellectual Property Stars/Logos, on or about August 20, 2014, Subject Seung admitted in his administrative interview that on or between February 21, 2013 and March 01, 2013, while on duty he accessed the Department's Data Network and used Department computers to manipulate a Windham Weaponry order form to include the Department's Star and Logo on it. Subject Seung admitted he used the Department's Data Network and Department computers for personal gain, and unofficial purposes which did not support the law enforcement mission of the Department when he sent and received e-mail messages and conducted research to promote the private company ([redacted]), his secondary employer. Subject Seung failed to receive permission to use the Department's Star and Logo, and/or used the Star and Logo in an unofficial capacity.

4. That in violation of the Manual of Policy and Procedures Sections 3-01/040.85, Cooperation during a Criminal Investigation; and/or 3-01/040.70, False Statements, on or about February 7, 2013, Subject Seung failed to make full, complete and/or truthful statements during an internal criminal investigations interview, as evidenced by but not limited to the following:

a. stating that he had permission to complete and send manufactured order forms to Windham Weaponry using several different deputies' information including [redacted], [redacted], [redacted], and [redacted] and/or words to that effect; and/or,

b. stating that he did not fill out the manufactured order forms sent to Windham Weaponry which contained several deputies' personal information, and/or words to that effect; and/or,

c. stating that he did not sign the manufactured order forms sent to Windham Weaponry using several different deputies' information, and/or words to that effect.

SUMMARY:

Subject Seung conducted private business for the [redacted] store while on-duty. Subject Seung used Department resources to conduct private business for the [redacted] store. Subject Seung used Department computers to generate order forms used to appear as if they are official Sheriff's Department forms and placed the Department's Star and Logo on the forms without obtaining expressed permission to use the Star or Logo. Subject Seung used employee's names and personal information in order to purchase weapons from a gun distributor without obtaining their expressed permission. Subject Seung also completed and signed order forms using the personnel's personal information for the purchase of the weapons without their expressed permission. Subject Seung denied placing personnel's personal information on some of the order forms and denied signing the forms when questioned during an internal criminal investigation. Subject Seung failed to provide full and complete answers during his internal interview when asked if he signed the forms that were submitted to the weapons distributor and or had expressed consent from Department members before he used their information to order the weapons.

The investigation reveals that On April 4, 2013, Deputy [redacted] was at the store [redacted] and saw a gun case containing an AR-15 rifle with his name attached. Deputy [redacted] did not order the rifle and became suspicious since his information was on file at the store and could have been used to order the rifle. Deputy [redacted] returned to work and reported the incident.

An Internal Criminal Investigation which was initiated into the possible identity theft of Deputy [redacted] revealed that Subject Seung was soliciting gun sales while at work.

Subject Seung had told numerous employees at the North County Correctional Facility (NCCF) he was a part owner with the [redacted] gun store and was promoting a group order for AR-15 rifles from Windham Weaponry. He admitted he was a part-time employee and the store made an order for approximately 20 rifles for numerous deputy personnel.

The investigation showed that Subject Seung manufactured a letterhead using departmental computers while at work. The letterhead was made by reprinting the Sheriff's Star and Logo and the words "Los Angeles County Sheriff's Department" on top

of a Windham Weaponry order form. The form was submitted to Windham Weaponry as if the letter was an authentic form of the Sheriff's Department. Subject Seung admitted to using departmental computers while at work to place the Sheriff's Star and Logo on a manufactured departmental letterhead in order to arrange for the purchase of AR-15 rifles from Windham Weaponry. Using this form also circumvented the Department's protocol to have a unit commander complete an employee verification when requested by outside sources.

Several deputies' names and personal information were on the various order forms submitted to Windham Weaponry. Several of them stated that they did not give Subject Seung permission to use their identities or sign their names to the manufactured order forms.

During the Internal Criminal Investigation, Subject Seung said he was not an owner of the store but a part-time employee. Subject Seung was asked if he was involved in any group orders, and he told investigators about the Windham Weapons order. Subject Seung said any deputies ordering an AR-15 rifle needed to deal directly with Windham Weaponry, and the company [redacted] only handled the transfer of the rifles. Subject Seung later stated that a group order was processed and paid by the private company [redacted] Subject Seung said numerous deputies approached him and asked him if he could order them AR-15 rifles through Windham Weaponry.

Subject Seung was asked on numerous occasions if he filled out the firearm purchase forms and signed the names of seven different deputies. Instead of providing investigators with a complete account of his efforts to obtain the weapons, Subject Seung made false statements of "no," or "the deputies filled out the forms themselves," or made reference to the forms being completed by "[redacted]," the [redacted] of the store. As the investigators presented Subject Seung with forms that appeared to have been completed by someone other than the employee, Subject Seung admitted to filling out the forms and signing the forms with "scribble," not the deputies' names. The signature placed on the signature lines of the form were placed there to pass as an authentic signature. Subject Seung made the additional false statement that the deputies knew he was filling out the paperwork using the deputies' information. All the deputies interviewed denied being told or asked for the use of their signature or information. Some stated that Subject Seung only asked to use their e-mail moniker.

At the completion of the Internal Criminal Investigation, a criminal filing was not pursued due to lack of criminal elements needed for prosecution; therefore, a unit-level investigation was started. Sergeant [redacted] and Deputies [redacted], [redacted], [redacted] and [redacted] were reinterviewed as witnesses. All the witnesses said they were approached by Subject Seung and asked if they wanted to buy an AR-15 rifle. Only Deputy [redacted] said she wanted the rifle, Subject [redacted] could not remember if he gave Subject Seung the impression that he wanted a rifle. None of the witnesses said they knew their information was being used on the manufactured order forms, and none of the witnesses gave Subject Seung permission to sign their names.

The witnesses said they did not give Subject Seung their personal information. The information was obtained from previous transactions recorded at [redacted] store.

Subject Seung stated he was not the owner of the store and he did not tell people he was a part owner of the store. He stated he did not conduct business for the [redacted] store while he was on duty for the Department and later recanted stating he did. He described his efforts to promote the [redacted] store while at work as accessing the Department's computers, manufacturing the order form so Windham Weaponry would accept it as legitimate, emailing the order forms to people at work, preparing gun orders and conducting research for the [redacted] store.

Subject Seung was asked how he got the deputies' personal and work information to complete the forms, and he initially said the deputies gave him the information or it could have been obtained by him from the [redacted] store records. Subject Seung admitted that he used the store files to obtain the deputies' personal information to complete the order forms.

DISCIPLINE ASSESSMENT

<u>Review of Applicable "Guidelines for Discipline" Sections</u>

The Department's Guidelines for Discipline lists the following analogous misconduct with associated disciplinary penalties:

<u>Review of Applicable "Guidelines for Discipline" Sections (continued)</u>

Performance to Standards	W/R to Discharge
General Behavior	W/R to Discharge
Performance to Duty	W/R to Discharge
Professional Conduct – Core Values	W/R to Discharge
Immoral Conduct	W/R to Discharge
Obedience to Laws, Regulations, and Orders	W/R to Discharge
Use of Communications Equipment	One to five Day Suspension
Use of Property Stars/Logos	W/R to Discharge
Cooperation during a Criminal Investigations	25 days to Discharge

Seung, Jae, #[redacted]
Deputy Sheriff
North County Correctional Facility
Custody Services Division – General Population

IV #2352595

False Statements | 10 days to Discharge

Assessment of Mitigating and Aggravating Factors

Severity of Infraction:

Subject Seung, used departmental equipment to manufacture a document which he submitted as an official Department form. His efforts circumvented Department protocol and broke the trust of his co-workers as they did not know their names were associated with the manufactured document. Subject Seung placed his responsibilities to the Department as secondary while at work when he promoted and used Department resources to promote the [redacted] while on duty. Subject Seung used employees' personal and confidential information without their permission so that he could obtain AR-15 rifles at a reduced rate. His actions breached his trust in the workplace.

Subject Seung failed to disclose the full, or complete truth regarding his activities and efforts to obtain weapons from the Windham Weaponry. Subject Seung displayed conduct contrary to the Core Values of the Department and integrity expected of a Law Enforcement personnel when he manufactured an order form and passed it as an official form, used the Department's trademarked star and logo without permission, used employees personal information with permission, placed a mark on the order forms as if they were authentic.

Intent, Truthfulness, and Acceptance of Responsibility:

Subject Seung's actions during his criminal investigation interviews and administrative interviews revealed that he did not provide full, complete and truthful answers until he was presented with facts to the contrary. Subject Seung initially accepted no responsibility for his actions. It appears that he diverted attention from his role in the purchase of the weapons in order to limit his culpability and responsibility as related to Department policy.

Degree of Culpability:

Subject Seung was solely accountable for his actions.

Past Performance and Disciplinary History:

Subject Seung has been an employee since October 1, 2010. His current performance evaluation is "very good." All evaluations prior to the current evaluation period were "very good." Subject Seung has no prior founded investigations

Seung, Jae, #[redacted] IV #2352595
Deputy Sheriff
North County Correctional Facility
Custody Services Division – General Population

Disposition:

Based upon the foregoing assessment of mitigating and aggravating factors, the following is the level of discipline to be assessed:

__X__ **Discharge**
_____ Reduction in Rank
_____ Suspension with loss of pay and benefits, for___ Days
_____ Written Reprimand
_____ No discipline recommended

COUNTY OF LOS ANGELES
SHERIFF'S DEPARTMENT

ADMINISTRATIVE INVESTIGATIVE SUMMARY

DATE / TIME: October 13, 2014 / 0800 hours

LOCATION: 29340 The Old Road, Castaic, CA 91384

IAB #: **North County Correctional Facility IV #2352595**

SUBJECT: Jae Seung #[redacted]

ALLEGATION

On May 7, 2013, at the request of the former NCCF Captain, Victor Trujillo, #[redacted], the Sheriff's Department's Internal Criminal Investigations Bureau (ICIB) opened an investigation regarding an allegation that Subject Jae Seung, #[redacted], used Deputy [redacted]s, #[redacted], personal information to purchase an assault rifle. Both deputies were assigned to North County Correctional Facility at the time of this incident.

INVESTIGATIVE SUMMARY

On April 4, 2013, Deputy [redacted] was at the store [redacted] in Santa Clarita where he was helping out at a store sponsored AK-47 build-out party. The party is a way for the store to make sales and for customers to save on the purchase of a firearm. Deputy [redacted] went into the back of the store and saw a gun case containing an AR-15 rifle with his name attached. Deputy [redacted] did not order the rifle and became suspicious since his information was on file at the store and could have been used to order the rifle. Deputy [redacted] became involved with [redacted] from a working relationship with Subject Seung at NCCF. Deputy [redacted] returned to work and reported the incident.

An Internal Criminal Investigation was initiated into the possible identity theft of Deputy [redacted] (see ICIB investigation). During the course of the investigation, it was learned that Subject Seung was soliciting gun sales while at work. Subject Seung told numerous NCCF employees that he was a part owner with the [redacted] gun store and was promoting a group order for AR-15 rifles from Windham Weaponry. The store made an order for approximately 20 rifles for numerous deputy personnel.

The investigation showed that Subject Seung manufactured a Sheriff's departmental letterhead, while at work, using departmental computers.

The letterhead was made by reprinting the Sheriff's Star and Logo and the words "Los Angeles County Sheriff's Department" on top of a Windham Weaponry order form. The form was submitted to Windham Weaponry as if the letter was an authentic form of the Sheriff's Department. The investigation revealed Deputies [redacted] and [redacted] did not give Subject Seung permission to use their identities or sign their names to the manufactured Department letterhead.

During the Internal Criminal Investigation, Subject Seung was interviewed at NCCF on February 7, 2014. Subject Seung said he was not an owner of the store [redacted] but a part-time employee. Subject Seung was asked if he was involved in any group orders and, he told investigators about the Windham Weaponry order. Subject Seung said that any deputies ordering an AR-15 rifle needed to deal directly with Windham Weaponry, and the company, [redacted], only handled the transfer of the rifles. Subject Seung later stated a group order was made and paid by the private company [redacted]. Subject Seung said numerous deputies approached him and asked him if he could order them AR-15 rifles through Windham Weaponry.

Subject Seung was asked on numerous occasions if he filled out the firearm purchase forms and signed the names of seven different deputies. Subject Seung made false statements of "no," or "the deputies filled out the forms themselves," or made reference to the forms being completed by [redacted]" the [redacted] of the store. Subject Seung later admitted to filling out the forms and signing the deputies' names. Subject Seung made the additional false statement of stating the deputies knew he was filling out the paperwork using the deputies' information. All the deputies interviewed denied being told or asked for the use of their signature or information.

Subject Seung was asked about the departmental letterhead used to order the AR-15 rifles from Windham Weaponry. Subject Seung admitted to using departmental computers, while at work, to place the Sheriff's Star and Logo on a manufactured departmental letterhead in order to arrange for the purchase of AR-15 rifles from Windham Weaponry.

The investigation revealed the weapons being purchased from Windham Weaponry were being offered at a discount to law enforcement personnel, and the Windham Company would only sell one rifle per person. If the law enforcement officer did not purchase the rifle from [redacted], the rifle would be sold at a higher price. This allowed for [redacted] to make a larger profit on weapons sold to the public.

At the completion of the Internal Criminal Investigation, a criminal filing was not pursued due to lack of criminal elements needed for prosecution and a unit-level investigation was then initiated. Deputies [redacted] and [redacted] were reinterviewed, and Subject Seung was reinterviewed at NCCF on August 20, 2014. Subject Seung was asked if he was the owner of the store [redacted], and he replied, "No."

Subject Seung was asked if he ever told anyone he was an owner of the store, and he said, "No." Subject Seung was asked if he ever conducted any business on behalf of [redacted] while at work, and he said, "No." He then changed his answer to "Yes."

Subject Seung was asked about the manufacturing of departmental letterhead, and he admitted to cutting and pasting the Sheriff's Star and Logo from the intranet website onto the Windham Weaponry order form. Subject Seung wanted the form to appear to be a departmental form so that Windham Weaponry would accept it as legitimate. He further stated that he used departmental computers to email the order forms to people at work and to prepare gun orders and research for [redacted]

Subject Seung was shown the order forms for Deputies [redacted], [redacted], [redacted] and [redacted] He said all the deputies approached him and wanted him to order a gun for them. He said he filled out the forms after the deputies told him to fill out the paperwork for them or for him to just order them a gun. During the interviews of the deputies, only Deputies [redacted] and [redacted] said they wanted an AR-15. The others said Subject Seung approached them to order an AR-15. Deputy [redacted] said he was asked by Subject Seung if he could use his email name to order an AR-15, and Deputy [redacted] would have the opportunity to buy the gun when it was delivered. None of the deputies gave Subject Seung permission to write their information or sign their names.

During the interview Subject Seung was asked about the false statements made during the interview with ICIB, specifically, when asked about a group order. During the interview Subject Seung was asked three separate times about a group AR-15 rifle order. Each time he answered, Subject Seung said that any deputies ordering an AR-15 rifle needed to deal directly with Windham Weaponry, and the company [redacted] only handled the transfer. When asked if he was being truthful, Subject Seung said he was because some people did make orders directly from Windham Weaponry, and [redacted] handled the transfer. Subject Seung made numerous references that his prior statements were truthful because, in some instances, there were scenarios that occurred the way he answered even though the answers were not made in reference to the question.

When asked about saying that he did not fill out and sign the order forms, Subject Seung said he made truthful statements because he did not recognize his own handwriting. Once he recognized his writing, he said he did fill out the forms. It should be noted, Subject Seung was shown other forms, which he filled out after he had recognized his own writing, and still said he did not fill out the form until asked several times. He then admitted to filling out and signing the forms.

Subject Seung was asked how he got the deputies' personal and work information to complete the forms, and he said that the deputies gave him the information. During the interviews of Deputies [redacted], [redacted], [redacted], [redacted], [redacted], [redacted] and [redacted] the deputies said they did not give Subject Seung their information, but it could have been obtained by him from [redacted] records, where the deputies had provided their information for other firearm purchases. Subject Seung admitted he used the store files to obtain the deputies' personal information to complete the order forms but said when he told me the deputies gave him their information, it came from a prior purchase.

DEPARTMENT WITNESS INTERVIEWS

Sergeant [redacted] #[redacted], was interviewed by NCCF's Operations Staff (Lieutenant Daniel Ross #[redacted] and Sergeant Donald Subler #[redacted]) on August 26, 2014.

While working at NCCF, Sergeant [redacted] stated that Subject Seung approached him in late 2012 and asked him if he would be interested in purchasing an assault rifle. Sergeant [redacted] was under the impression that Subject Seung was the owner of a local gun store in Santa Clarita called [redacted]. He told him he was not interested. Sergeant [redacted] did recall, several months after this initial contact, telling Subject Seung he would be willing to purchase an assault rifle if one was available.

Sometime later Sergeant [redacted] received an invoice in the mail from Windham Weaponry for an amount of money. Shortly after that he received an email from Federal Express stating an unknown item had been shipped. He was concerned he may be the victim of identity theft and did not open the email. He knew Windham Weaponry was a company that produced assault rifles and when he read the weight of the item which was printed on the invoice, he believed it was consistent with the weight of an AR-15 rifle. He then remembered Subject Seung asking him if he was interested in purchasing a rifle.

Sergeant [redacted] then contacted Subject Seung at [redacted] and asked if a gun had been purchased in his name. Sergeant [redacted] was concerned because he had not filled out any forms and had no knowledge his name was used to purchase a weapon. Subject Seung assured Sergeant [redacted] he did not owe any money or purchase a weapon.

Sergeant [redacted] was then shown the same purchase order he was shown during his ICIB interview which had "Los Angeles County Sheriff's Department" printed on the top of the form **(Exhibit C)**. Sergeant [redacted] did not fill out any of the information on the form and had never seen it prior to his first encounter during the ICIB interview.

Sergeant [redacted] believed his personal information and copy of work identification was kept on file at [redacted] from prior weapons purchases, and Subject Seung used this information and counterfeit form to purchase an assault rifle.

Sergeant [redacted] was extremely concerned that an assault rifle had been purchased in his name and was in the possession of someone else. Subject Seung never offered to sell Sergeant [redacted] the rifle, he only assured Sergeant [redacted] that everything had been taken care of and that he was not responsible for the weapon. Sergeant [redacted] never received or paid for an assault rifle and has not returned to [redacted] or spoken with Subject Seung since approximately April of 2013 when he was in the store and confirmed the above information.

Deputy [redacted], **#** [redacted], was interviewed by NCCF's Operations Staff (Lieutenant Daniel Ross # [redacted] and Sergeant Donald Subler # [redacted]) on August 27, 2014.

Deputy [redacted] attended the Police Academy and worked as a [redacted] with Subject Seung. They have known each other for quite some time and were both eventually hired as Los Angeles County Deputy Sheriff's. Subject Seung told Deputy [redacted] he had opened a gun store, [redacted] and was the owner. Deputy [redacted] purchased a handgun from [redacted] approximately two years ago. At some point they discussed numerous weapons including AR-15 rifles.

Sometime later Deputy [redacted] received an invoice regarding an AR-15 rifle as well as emails from UPS regarding a delivery. He believed someone had used his personal information and made purchases without his consent. He tracked the package and determined it went to [redacted]

He then called Subject Seung numerous times and left detailed messages regarding his findings and requested that Subject Seung return his call. Deputy [redacted] also sent several emails to no avail. He finally was able to contact Subject Seung and question him about the emails. Subject Seung said he had the AR-15 that he (Deputy [redacted] had ordered. Deputy [redacted] never requested to purchase the weapon. He believed that the way Subject Seung presented the situation, the weapon may actually be a gift or offered at a specially reduced price. On his prior purchase, he (Deputy [redacted] paid for the weapon before it was ordered. Deputy [redacted] felt like the sale was being forced upon him. Subject Seung told Deputy [redacted] the gun was at his store, and he could come pick it up. Deputy [redacted] told him he would be extended on picking up the weapon because he did not have the money and because he was leery of the transaction.

Deputy [redacted] never did go to [redacted] to pick up or purchase the weapon and has not had contact with Subject Seung since the above conversation took place. Deputy [redacted] was then contacted by ICIB regarding this incident.

Deputy [redacted] was then shown the form which had "Los Angeles County Sheriff's Department" and the Sheriff's Logo on top (**Exhibit C**). He denied ever seeing the form (except during the ICIB interview) and did not fill out the form or ever give anyone permission to use his personal information or signature.

Deputy [redacted] never provided Subject Seung his Los Angeles County Identification Card in an effort to purchase an AR-15 rifle. Deputy [redacted] believes it is possible that Subject Seung obtained this information from his previous gun purchase which took place at [redacted] Deputy [redacted] believes he was taken advantage of and deceived by Subject Seung by having his identity used to obtain a weapon without his knowledge.

Senior Deputy [redacted] #[redacted], was interviewed by NCCF's Operations Staff (Lieutenant Daniel Ross #[redacted] and Sergeant Donald Subler #[redacted] on August 28, 2014. Senior Deputy [redacted] was at an AR-15 build-out party at [redacted]. He saw a gun case which had his name on it. He opened the case and saw an AR-15 rifle. He left the gun there and contacted the manufacturer of the rifle (Windham Weaponry) and inquired if his name had been used to purchase a rifle. Windham Weaponry provided him with documentation which indicated a rifle had been obtained in his name.

Prior to this, Subject Seung had asked Senior Deputy [redacted] if he was interested in purchasing an AR-15-type rifle. Senior Deputy [redacted] was very clear in his response and told Subject Seung he was not interested in purchasing a rifle. Senior Deputy [redacted] was very concerned and upset regarding this issue and notified his supervisor, Sergeant Dahring, of his findings.

Senior Deputy [redacted] was then shown a form which had "Los Angeles County Sheriff's Department" and the Sheriff's Logo printed on top (**Exhibit C**). He never gave anyone permission to place his personal information on the form or use his signature.

Senior Deputy [redacted] believed the form was used to order a rifle in his name which was actually sold to someone else.

Senior Deputy [redacted] had purchased several weapons from [redacted] on prior occasions and had provided his Los Angeles County Identification and personal information to Subject Seung to secure the transaction. He believes that was where Subject Seung obtained his information to secure a rifle from Windham Weaponry.

Senior Deputy [redacted] said he was concerned because there may be a rifle which was registered in his name which was possessed by someone else. Senior Deputy [redacted] met Subject Seung in 2012, and Subject Seung presented himself as the owner of [redacted]

In an immediate follow-up interview, Senior Deputy [redacted] stated he believed the weapon was obtained using his information as a law enforcement officer so that Subject Seung and [redacted] could purchase the rifle at a discounted price of $775 and resell it to someone else at the price of $1,100. The paperwork he received from Windham Weaponry confirmed the [redacted] law enforcement purchase of this weapon was $775. He saw the same weapon in [redacted] listed at $1,100.

Deputy [redacted], #[redacted], was interviewed by NCCF's Operations Staff (Lieutenant Daniel Ross #[redacted] and Sergeant Donald Subler #[redacted]) on September 8, 2014. Deputy [redacted] worked with Subject Seung at NCCF. Subject Seung told Deputy [redacted] he was the owner of a local gun store ([redacted]) and in the process of setting up the business. Subject Seung asked Deputy [redacted] if he was interested in purchasing an AR-15 rifle. Deputy [redacted] stated he already owned an AR-15 rifle and wasn't interested in another one; however, if his tax return was large enough, he might be interested. Deputy [redacted] stated this was his way of politely telling him no. Looking back, he probably just should have told him "No."

Deputy [redacted] never gave Subject Seung permission to use his California Identification or Los Angeles County Sheriff's Department Identification to purchase an AR-15 rifle.

Deputy [redacted], #[redacted], was interviewed by NCCF's Operations Staff (Lieutenant Daniel Ross #[redacted] and Sergeant Donald Subler #[redacted] on September 10, 2014. Deputy [redacted] knows Subject Seung from working with him at NCCF. Deputy [redacted] asked Subject Seung if he could purchase an AR-15 rifle through his place of business ([redacted]. Subject Seung told Deputy [redacted] that he needed to fill out paperwork and provide departmental identification to purchase the rifle. Deputy [redacted] never got around to filling out the necessary paperwork, and Subject Seung told him the deadline for the law enforcement purchase had expired and it was too late to complete the purchase.

Deputy [redacted] was shown a document which had "Los Angeles County Sheriff's Department" and the Sheriff's Logo printed on top **(Exhibit C)**. Deputy [redacted] recognized the document as a piece of paperwork Subject Seung had provided him which needed to be completed to purchase an AR-15 rifle. Deputy [redacted] saw that the form had been filled out; however, he did not complete the form, nor did he give anyone permission to fill it out for him.

Deputy [redacted] then recalled that he had been approached by Subject Seung who showed him this form and stated it had to be completed that day to secure the transaction. Deputy [redacted] told Subject Seung he could not do it at this time, but Subject Seung assured him it would be "okay." Deputy [redacted] could not recall if he provided Subject Seung a copy of his identification at that time.

Deputy [redacted] did know that Subject Seung had a copy of his identification on file at his place of business from a prior purchase. Deputy [redacted] stated that he was desirous of purchasing a rifle.

Deputy [redacted], # [redacted], was interviewed by NCCF's Operations Staff (Lieutenant Daniel Ross # [redacted] and Sergeant Donald Subler # [redacted]) on October 19, 2014. Deputy [redacted] is a coworker of Subject Seung. Deputy [redacted] stated Subject Seung called him while they were both at work and asked to use his (Deputy [redacted]'s) email address to purchase an AR-15 rifle. Deputy [redacted] agreed to let Subject Seung secure a rifle using his email address.

Deputy [redacted] was then shown a form which had "Los Angeles County Sheriff's Department" and the Sheriff's Logo printed on top (**Exhibit C)**. Deputy [redacted] stated he did not fill out the form and never gave anyone permission to fill out the form on his behalf. Deputy [redacted] did not purchase an AR-15 rifle from Subject Seung.

Deputy [redacted] did purchase a weapon from [redacted] on a prior occasion and gave Subject Seung a copy of his California Identification and Los Angeles County Sheriff's Identification to secure the purchase. Subject Seung told Deputy [redacted] he was the owner of [redacted].

Deputy [redacted] # [redacted], was interviewed by NCCF's Operations Staff (Lieutenant Daniel Ross # [redacted] on October 19, 2014. Deputy [redacted] stated she was interested in purchasing an AR-15 rifle. Subject Seung told Deputy [redacted] he was the co-owner of a gun store called [redacted] and he was currently taking orders from other deputies for AR-15 rifles. He told Deputy [redacted] the rifle would not be available for purchase for several months. Subject Seung had her sign a piece of paper but did not require a deposit for the weapon.

Several months later Deputy [redacted] received an email indicating the rifle had been sent by the manufacturer to [redacted] A short time later Subject Seung let her know that the rifle had arrived at [redacted] and was available for purchase. Several months later she purchased the weapon.

Deputy [redacted] was shown a form which had "Los Angeles County Sheriff's Department" and the Sheriff's Logo printed on top (**Exhibit C)**. Deputy [redacted] stated she did not fill out the form, nor did she give anyone permission to complete it on her behalf.